



Approved for Release
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Date

NATIONAL OCEANIC AND ATMOSPHERIC ADMINISTRATION

OFFICE OF CHIEF ADMINISTRATIONS OFFICER
REAL PROPERTY, FACILITIES AND LOGISTICS OFFICE
LOGISTICS OPERATIONS DIVISION
PERSONAL PROPERTY MANAGEMENT BRANCH

PROPERTY BULLETIN #001, FY 2016

SUBJECT: Contractors Serving as Property Contacts

EFFECTIVE DATE: April 15, 2016

EXPIRATION DATE: Effective until canceled or superseded

BACKGROUND: Public Law (PL) 105-270, Section 5 defines the term *inherently governmental* as a “function that is so intimately related to the public interest as to require performance by Federal Government employees.” The Federal Acquisition Regulation (FAR) Subpart 7.5, “*Inherently Governmental Functions*” states one example of an inherently governmental function is “the determination of what Government property is to be disposed of and on what terms.” Although, guidance pertaining to inherently governmental functions is published, there is no legislative or regulatory law that prohibits a Contractor from serving as a Property Contact; thus, guidance regarding such policy is defined by each Government agency.

PURPOSE: The purpose of this bulletin is to establish requirements and define the extent to which a Contractor may serve as a Property Contact.

PROCEDURES/APPLICABILITY: In reference to allowing Contractors to serve as Property Contacts, these procedures are based on guidance received from the Department of Commerce (DOC). In order for a Contractor to serve as a Property Contact, the following requirements must be met:

- Property Manager must acquire a copy of the Statement of Work (SOW) that confirms that the Contractor has been hired as an inventory support personnel with duties that require entering and processing accountable personal property within the Personal Property Management System (PPMS).
- Property Custodian must originate and provide a memorandum defining Contractor duties. Memorandum must reflect SOW language and note detailed SOW contractual

requirements that would require data entry within the PPMS to perform inventory related duties, such as adding assets. Memorandum shall be addressed to the Property Manager and routed through the Contracting Officer Representative and Property Accountability Officer.

- Provide a completed Property Contact Approval Letter which must be signed by the Contracting Officer Representative, Property Custodian, Property Accountability Officer and Property Manager.
- Contractor must complete all training required by the Property Custodian.
- Property Manager must maintain an electronic Property Contact folder to retain documents noted above and training certificates of the subject Contractor.
- Failure to comply with this bulletin will result in the Contractor losing the Property Contact role within the PPMS.

With property management being an inherently governmental function, the Property Contact shall not relieve the Property Custodian of any property management responsibilities. The Property Contact supports the Property Custodian, and the Property Custodian maintains oversight of the Property Contact's activities. Property Contact access to the PPMS shall be restricted to the Property Contact role within the PPMS. Responsibilities identified in the DOC Personal Property Management Manual are still applicable. Also, all required support documents are subject to review by the PMO, DOC, A-123 and KPMG for audit purposes.

REFERENCES: DOC Property Bulletin #003 Dated 08/09/2013, [DOC Property Bulletin #003](#)
DOC Personal Property Management Manual, Chapter 1
FAR Subpart 7.5, Inherently Governmental Functions
PL 105-270, Section 5

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